

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

In Re: Neomedic Pelvic Repair)	
System Products Liability)	Civil Action No. MDL 2511
)	
THIS DOCUMENT RELATES TO)	
ALL PLAINTIFFS.)	

NOTICE OF SETTLEMENT PROGRAM

1. Plaintiffs' Co-Lead Counsel for the Neomedic MDL have reached an agreement with Neomedic to establish a voluntary settlement program for all claimants implanted with Neomedic transvaginal mesh products. The agreement is set forth in the Memorandum of Understanding (attached).
2. Subject to the terms of the MOU, Neomedic's insurer will tender the remaining amounts of Neomedic's one insurance policy (which provides coverage estimated to be \$2,192,277, as of November 16, 2015). These funds will be allocated among Registered Claimants (minus deductions for certain expenses of the Trustee and for non-participating claimants).
3. The following are key deadlines:
 - **DECEMBER 18, 2015:** deadline for lawyers/pro se claimants to register for the Settlement Program. Registration Forms and Exhibits (MOU, Exhibits B-1 and B-2) can be completed and sent to the settlement trustee, Scott Freeman, at neomedic@settlement-alliance.com. (Copies of the forms and medical records can be sent to Karen Beyea-Schroeder, at Karen_Beyea-Schroeder@fleming-law.com.).
 - **JANUARY 31, 2016:** deadline for all medical records to be submitted.
 - **FEBRUARY 12, 2016:** Trustee will notify Registered Claimants of points allocation. Points will be allocated as follows: 1 point for product identification, and then 4 points

for each surgical procedure performed under general or regional anesthesia to treat a condition related to the implant of one or more Neomedic transvaginal mesh products.

- **FEBRUARY 26, 2016**: deadline for Registered Claimants to request for reconsideration of the Trustee's point allocation.
- **MARCH 18, 2016**: deadline for Trustee to inform each Registered Claimant of their settlement allocation.
- **MAY 13, 2016**: deadline to submit releases.

4. Plaintiffs' Co-Lead Counsel request that all plaintiffs' counsel and claimants direct any questions regarding the settlement to [Karen Beyea-Schroeder@fleming-law.com](mailto:Karen.Beyea-Schroeder@fleming-law.com).

Date: November 25, 2015

/s/Derek Potts

Derek Potts
THE POTTS LAW FIRM
100 Waugh Drive, Suite 350
Houston, Texas 77007
Tel: 713-963-8881
dpotts@potts-law.com

/s/Riley L. Burnett, Jr.

Riley L. Burnett, Jr
BURNETT LAW FIRM
55 Waugh Drive, Suite 803
Houston, Texas 77007
Tel: 832-413-4410
Fax: 832-900-2120
rburnett@burnettlaw.com

/s/Karen Beyea-Schroeder

Karen Beyea-Schroeder (TX Bar No. 24054324)
FLEMING, NOLEN & JEZ, L.L.P.
2800 Post Oak Blvd., Suite 4000
Houston, Texas 77056-6109
Tel: 713-621-7944
Fax: 713-621-9638
karen_beyea-schroeder@fleming-law.com
ATTORNEY FOR PLAINTIFFS

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CERTIFICATE OF SERVICE

I hereby certify that on November 25, 2015, I served a copy of Notice of Settlement Program on the following counsel of record via Electronic Mail to:

Carolyn Purwin Ryan, Esq.
Cipriani & Werner PC
450 Sentry Pkwy, Ste 200
Blue Bell, PA 19422
Tel: 610-567-0700
CPurwin@c-wlaw.com

ATTORNEY FOR DEFENDANTS

/s/Derek Potts

Derek Potts
THE POTTS LAW FIRM
100 Waugh Drive, Suite 350
Houston, Texas 77007
Tel: 713-963-8881
dpotts@potts-law.com

/s/Riley L. Burnett, Jr.

Riley L. Burnett, Jr
BURNETT LAW FIRM
55 Waugh Drive, Suite 803
Houston, Texas 77007
Tel: 832-413-4410
Fax: 832-900-2120
rburnett@burnettlaw.com

/s/Karen Beyea-Schroeder

Karen Beyea-Schroeder (TX Bar No. 24054324)
FLEMING, NOLEN & JEZ, L.L.P.
2800 Post Oak Blvd., Suite 4000
Houston, Texas 77056-6109
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Fax: 713-621-9638
karen_beyea-schroeder@fleming-law.com
ATTORNEY FOR PLAINTIFFS